

REMARKS

The issues currently in the instant application are as follows:

- Claims 1-3, 5, and 7-11 are rejected under 35 U.S.C. § 103(a) as being unpatentable over US 5,852,414 (Yu) in view of US 5,007,008 (Beers). Applicant interprets "Claims 1-11 are rejected" on page 3 numbered paragraph 6 of the May 30, 2006 Office Action as being a clerical error.

Applicant traverses the outstanding rejection and requests reconsideration and withdrawal thereof in light of the amendments and remarks contained herein.

Amendments to the Claims

New claim 22 is supported by FIG. 1, FIG. 3, and page 7 lines 5-13 of the originally-filed specification.

New claim 23 is supported by FIG. 5, FIG. 6, page 9 line 4 through page 10 line 30 of the originally-filed specification, and page 12 lines 3-31 of the originally-filed specification.

New claim 24 is supported by original claim 11, FIG. 1, FIG. 5, page 9 line 28 to page 10 line 3 of the originally-filed specification, and page 10 lines 14-30 of the originally-filed specification.

New claim 25 is supported by FIG. 5, FIG. 6, page 9 line 4 through page 10 line 30 of the originally-filed specification, and page 12 lines 3-31 of the originally-filed specification.

No new matter has been added.

35 U.S.C. § 103(a) – Yu and Beers

Claims 1-11 are rejected under 35 U.S.C. § 103(a) as being unpatentable over US 5,852,414 (Yu) in view of US 5,007,008 (Beers). As the Examiner has noted, Yu "does not expressly disclose a priority routine that enters a character associated with the first

alphanumeric label when the first key is held for less than a first toggle period and enters a character associated with the second alphanumeric label when the first key is held for more than the first toggle period.” Yu is completely disambiguated in that a switch (FIG. 3 and FIG. 4 “alphabet / numeral activating switch”) limits whether a single keypress of any non-zero length of time results in a numeral or an alphabet character.

Beers disambiguates a keypress using either a multi-press or multi-tap pattern (column 4 lines 31-36), which is also described on page 2 lines 17-25 of the pending application, or a duration-based single press (column 4 lines 37-44). The disambiguation approach of Beers contradicts Yu, and the motivation to combine articulated by the Examiner is inadequate because it fails to provide a motivation to discard the perfectly adequate Yu disambiguation in favor of the Beers disambiguation.

Thus, claim 1 is not unpatentable in view of Yu and Beers. Claims 2-3, 5, and 7-11 depend directly or indirectly upon claim 1 and thus are also not unpatentable in view of Yu and Beers. Reconsideration and withdrawal of the rejection of claims 1-3, 5, and 7-11 under 35 U.S.C. § 103(a) as being unpatentable in view of Yu and Beers is respectfully requested.

New Claims

New claims 22-25 present further aspects of the invention that are patentable in view of the references cited.

S U M M A R Y

The application is in condition for allowance and a favorable response at an early date is earnestly solicited. Should the Examiner have any questions, comments, or suggestions, the Examiner is invited to contact Applicant’s representative at the telephone number indicated below.

Please charge any fees associated herewith, including extension of time fees, to
Deposit Account 502117.

Respectfully submitted,

Please send correspondence to:
Motorola, Inc.
Intellectual Property Dept. (SYC)
600 North U.S. Highway 45, W4-39L
Libertyville, IL 60048
Customer Number: 20280

By: <u>/Sylvia Chen/</u>	<u>01AUG2006</u>
Sylvia Chen	Date
Attorney for Applicant	
Registration No. 39,633	
Tel. No. (847) 523-1096	
Fax No. (847) 523-2350	
Email: Sylvia.Chen@motorola.com	